

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SIMON CAMPBELL and PENNSYLVANIANS	:	
FOR UNION REFORM,	:	
		Plaintiffs,
v.	:	No. 2:18-CV-892-JD
	:	
PENNSYLVANIA SCHOOL BOARDS	:	
ASSOCIATION, MICHAEL FACCINETTO,	:	
DAVID HUTCHINSON, OTTO W. VOIT III,	:	
KATHY SWOPE, LAWRENCE FEINBERG,	:	
ERIC WOLFGANG, DANIEL O'KEEFE,	:	
DARRYL SCHAFER, THOMAS KEREK,	:	
and LYNN FOLTZ,	:	
		Defendants.
	:	

**MOTION FOR THE IMPOSITION OF SANCTIONS AGAINST
PLAINTIFFS' COUNSEL FOR VIOLATIONS
OF THE RULES OF PROFESSIONAL CONDUCT**

Defendants, Pennsylvania School Boards Association, Michael Faccinetto, David Hutchinson, Otto W. Voit III, Kathy Swope, Lawrence Feinberg, Eric Wolfgang, Daniel O'Keefe, Darryl Schafer, Thomas Kerek, and Lynn Foltz, by and through their undersigned counsel, file this Motion to Sanction Plaintiffs' Counsel, Jacob Cohn, and his firm, Gordon & Rees Scully Mansukhani, for Violations of the Rules of Professional Conduct. The sanctions sought are disqualification of Cohn and his firm or, in the alternative, an award of attorney's fees incurred in seeking sanctions and responding to Cohn's conduct, which is described below. Defendants submit the attached Memorandum of Law, as well as an Opinion Letter of legal

ethics expert, Robert H. Davis, Jr., Esquire (Exhibit D-165), in support of this Motion.

Respectfully submitted,

Date: July 20, 2018

/s/ Craig Ginsburg
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of July 2018, I electronically transmitted the foregoing Motion for Sanctions and the accompanying Memorandum of Law to be filed to the Clerk's Office using the Court's Electronic Case Filing system ("ECF") for filing and transmittal of a Notice of Electronic Case Filing to all counsel via the ECF, in accordance with Fed. R. Civ. P. 5(b) and E.D. Pa. L.R. 5.1.2.

/s/ Craig Ginsburg
Craig Ginsburg